

Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

BRIAN FARRELL,

Defendant.

NO. CR15-029RAJ

**GOVERNMENT'S MOTION TO SEAL
RESPONSE TO MOTION TO COMPEL
AND ACCOMPANYING EXHIBITS**

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant United States Attorney for said District, respectfully requests that the response to the motion to compel and accompanying exhibits be filed under seal because the response repeatedly references exhibits that were produced under a protective order in this case.

//

//

//

1 Moreover, the motion to compel, and the response thereto, relate to matters that are the
2 subject of pending, ongoing criminal investigations.

3 DATED this 1st day of February, 2016.

4 Respectfully submitted,

5 ANNETTE L. HAYES
6 United States Attorney

7
8 /s/ Thomas M. Woods

9 THOMAS M. WOODS

10 Assistant United States Attorney

11 United States Attorney's Office

12 700 Stewart Street, Suite 5220

13 Seattle, Washington 98101-1271

14 Telephone: (206) 553-7970

15 E-mail: Thomas.Woods2@usdoj.gov
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the defendant.

/s/ Salee Porter

SALEE PORTER

Paralegal

United States Attorney's Office

700 Stewart Street, Suite 5220

Seattle, Washington 98101-1271

Phone: (206) 553-4345

Fax: (206) 553-0755

E-mail: Salee.Porter@usdoj.gov